

# **EXHIBIT E**

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

ETHLOKIA PLUMBER, ex rel., K.W.

*Plaintiffs,*

v.

HARRIS COUNTY DEPARTMENT  
OF EDUCATION,

*Defendant.*

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CIVIL ACTION NO. 4:20-CV-00672

**DECLARATION OF RON ANGELETTI**

I, Ron Angeletti, hereby declare as follows:

1. I am a former employee of Harris County Department of Education. I was a teacher at ABS East for the 2016-17 school year. Prior to this I was a teacher at Highpoint School, a HCDE campus for expelled or adjudicated youth. While I was at Highpoint, I worked in the summer at ABS East with students who received summer education services.

2. While working at ABS East, I became concerned about the lack of support for the teachers and paraprofessionals because there were no behavior specialists on campus. I believed that the staff were unable to meet the needs of the students assigned to this behavior campus without this support. Without this support, staff were overwhelmed, and it was difficult for many to implement the individual education plans of each student, including the accommodations, and the individualized behavior improvement plan.

3. The lack of support also resulted in an overuse of restraints of students. I do not believe that HCDE provided adequate training on restraints and de-escalation techniques. Because I did not receive adequate training, I did not perform restraints.

4. Teachers and paraprofessionals were not given time to prepare for the arrival of new students. I asked administration to provide each student's paperwork in advance of arrival, but this was not done. Often, teacher would receive a student's paperwork the same day the student arrived on campus.


5. It was very common for the crisis response team at ABS East to first engage with a student when the student was in crisis. The members of this team would not know the individual accommodations for each child, or what was in the child's behavior improvement plan.

6. In February 2017, I emailed Dr. Keys, an administrator at ABS West, to ask about the campus's behavior specialist. I then emailed Dr. Colbert, HCCE's Superintendent, to express my concern about the lack of behavior specialists. A true and correct copy of these emails is attached as Exhibit A.

7. I was fired in February 2017 after speaking out about my concerns. I later raised my concerns with the HCDE Board in April 2018.

I swear under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated this 3rd day of June 2021, at New Orleans, Louisiana.

DocuSigned by:  
  
2CE7E302587B4B2...  
Ron Angeletti

## EXHIBIT A

**From:** Ron Angeletti  
**To:** Victor Keys  
**Subject:** Behavior Specialist  
**Date:** Wednesday, February 8, 2017 8:15:04 AM

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Dr. Keys,

Would you please provide me the name and contact info of your campus Behavior Specialist.

Thank you,

Ron Angeletti

**From:** Ron Angeletti  
**To:** James Colbert  
**Cc:** Jonathan M. Parker; Kimberly McLeod; Jesus Amezcua; Natasha Truitt; Dee Mattox-Hall; Brenda Mullins; ABCEAST Email Distribution Group; ABCWEST Email Distribution Group; HPN Staff; HPE Staff  
**Subject:** RE: Staff Member  
**Date:** Thursday, February 16, 2017 4:52:26 PM

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Mr. Colbert,

A week has lapsed since you received my email regarding inadequate staffing. Your failure to address this matter suggest that you're out of touch with the needs of our students and you intend to maintain the status quo. Your negligence is counterproductive to the efforts of so many campus level staff that go above and beyond daily for the benefit of students. Perhaps you should break for to visit. Maybe meeting these students will cause you to develop a little compassion.

r/

Angeletti

**From:** Ron Angeletti  
**Sent:** Thursday, February 09, 2017 9:16 AM  
**To:** James Colbert <jcolbert@hcde-texas.org>  
**Cc:** Jonathan M. Parker <jparker@hcde-texas.org>; Kimberly McLeod <kmcleod@hcde-texas.org>; Jesus Amezcua <jamezcua@hcde-texas.org>; Natasha Truitt <ntruitt@hcde-texas.org>; Dee Mattox-Hall <DMattox-Hall@hcde-texas.org>; Brenda Mullins <bmullins@hcde-texas.org>; ABCEAST Email Distribution Group <ABCEstaff@hcde-texas.org>; ABCWEST Email Distribution Group <ABCWstaff@hcde-texas.org>  
**Subject:** RE: Staff Member

Mr. Colbert,

Are you aware that your Behavior Centers (ABS East, ABS West) do not have Behavior Specialist on staff? If so, how do you suppose that the needs of the students are being meet as it pertains to behavior?

r/

R. Angeletti

**From:** Victor Keys  
**Sent:** Wednesday, February 08, 2017 3:59 PM  
**To:** Ron Angeletti <rangeletti@hcde-texas.org>  
**Cc:** Mindy Robertson <mrobertson@hcde-texas.org>

**Subject:** RE: Staff Member

We do not have a campus behavior Specialist at this time. We share a BCBA. Thanks!

**From:** Ron Angeletti  
**Sent:** Wednesday, February 08, 2017 12:24 PM  
**To:** Victor Keys <[vkeys@hcde-texas.org](mailto:vkeys@hcde-texas.org)>  
**Cc:** Mindy Robertson <[mrobertson@hcde-texas.org](mailto:mrobertson@hcde-texas.org)>  
**Subject:** RE: Staff Member

Dr. Keys,

Who are you referring to... It is my understanding that ABS East does not have a Behavior Specialist. Would you please specifically state the name and contact information of your campus (ABS West) Behavior Specialist.

Thanks,

Angeletti

**From:** Victor Keys  
**Sent:** Wednesday, February 08, 2017 11:26 AM  
**To:** Ron Angeletti <[rangeletti@hcde-texas.org](mailto:rangeletti@hcde-texas.org)>  
**Subject:** Staff Member

Mr. Angeletti we have the same Behavior Specialist as the ABS-East campus. Thanks!

Dr. Victor Keys  
Principal, ABS West  
7800 Westglenn  
Houston, TX 77063  
713-339-9411 Ext 1416  
713-978-7662 Fax

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